

From: [ANDERSON Jim M](#)
To: [MCCLINCY Matt](#); [Eric Blischke/R10/USEPA/US@EPA](#)
Cc: [Chip Humphrey/R10/USEPA/US@EPA](#); [Kristine Koch/R10/USEPA/US@EPA](#); [LACEY David](#)
Subject: RE: Draft Letter on RPAC Groundwater
Date: 11/04/2008 05:02 PM

Eric,

Thanks for giving DEQ the opportunity to review EPA's draft letter. Here are our comments.

General Comments

1. EPA's draft letter appear to have 2 purposes. 1st, identify in-water RI data gaps. 2nd, suggest how DEQ should consider proceeding with our upland source control decisions (SCDs) at the site. DEQ suggests EPA re-structure your letter & send 1 letter to LSSI/LWG regarding the in-water RI data gaps, & 1 letter or memo to DEQ with your suggestions for us proceeding with upland SCDs at the site.

SLLI's subject tech memo was prepared in response to the EPA/LWG meeting on TZW data gaps in the Portland Harbor in-water RI. DEQ did not request LSSI to complete the work to support upland source control..., it was done to support the in-water RI, & we do not know why LSSI addressed the tech memo to DEQ rather than EPA. We forwarded the tech memo to EPA when we received it. EPA's letter should be addressed to the parties responsible for identifying & resolving in-water RI/FS data gaps, i.e., LSSI & the LWG, not DEQ.

DEQ will primarily base our source control efforts & decisions on LSSI's pending revised Source Control Evaluation (SCE). We will supplement our efforts & decisions with in-water information collected by LSSI &/or the LWG.

Specific Comments

1. Is an upland RI & SCE needed for EPA to determine if in-water data gaps exist?- In the 2nd page of EPA's letter, you state that an upland RI & SCE are needed in order for EPA to determine if there are any in-water PH RI/FS data gaps. This is a new requirement that hasn't been previously applied to other sites in the harbor. If it is in-water RI/FS data gaps, then LSSI or the LWG should fill it under EPA oversight.

2. Direction to LSSI & the LWG- EPA's letter does not provide clear direction to the LSSI or the LWG regarding the schedule to

address the data gaps, the process for addressing them, & the fact that EPA is the Lead Agency overseeing the LWG in their assessment on in-water risk from TZW. As a side note, statements made by the SLLI team in recent meetings with DEQ indicate that based on the EPA/LWG TZW meeting, SLLI does not believe that EPA has any ongoing concerns about in-water data TZW data gaps for Rhone Poulenc.

Jim Anderson

Manager, DEQ Portland Harbor Section

ph: 503.229.6825

fax: 503.229.6899

cell: 971.563.1434

-----Original Message-----

From: MCCLINCY Matt

Sent: Monday, October 27, 2008 8:33 AM

To: 'Blischke.Eric@epamail.epa.gov'; ANDERSON Jim M

Cc: Humphrey.Chip@epamail.epa.gov; Koch.Kristine@epamail.epa.gov; LACEY David

Subject: RE: Draft Letter on RPAC Groundwater

Eric,

Thanks for giving us a chance to review the draft letter. I have a couple of potential issues that I want to discuss with Jim. We will get back to you ASAP.

Matt

-----Original Message-----

From: Blischke.Eric@epamail.epa.gov

[<mailto:Blischke.Eric@epamail.epa.gov>]

Sent: Friday, October 24, 2008 1:51 PM

To: ANDERSON Jim M

Cc: Humphrey.Chip@epamail.epa.gov; Koch.Kristine@epamail.epa.gov; LACEY David; MCCLINCY Matt

Subject: RE: Draft Letter on RPAC Groundwater

Ok - must have forgotten to attach it.

Here it is

Eric

(See attached file: DraftEPACCommentsRPACDGZMemo102408.doc)

"ANDERSON Jim
M"

<ANDERSON.Jim@de

q.state.or.us>
To

Eric
Blischke/R10/USEPA/US@EPA,

10/24/2008 11:28 "MCCLINCY
Matt"

AM
<MCCLINCY.Matt@deq.state.or.us>

cc

Kristine
Koch/R10/USEPA/US@EPA,

Chip
Humphrey/R10/USEPA/US@EPA,

"LACEY
David"

<LACEY.David@deq.state.or.us>

Subject

RE: Draft Letter on
RPAC

Groundwater

Eric, I don't the attached letter. I added Dave as a cc, so you have his address.

Jim

-----Original Message-----

From: Blischke.Eric@epamail.epa.gov

[<mailto:Blischke.Eric@epamail.epa.gov>]

Sent: Friday, October 24, 2008 11:10 AM

To: MCCLINCY Matt; ANDERSON Jim M

Cc: Koch.Kristine@epamail.epa.gov; Humphrey.Chip@epamail.epa.gov

Subject: Draft Letter on RPAC Groundwater

Attached is a draft letter. I do not have David Lacey's email so can you please forward to him.

We are intending on sending this letter to DEQ but copying the RPAC representatives copied on the memo sent to Matt.

Please look this over and add any edits you think appropriate. We can discuss as necessary.

Eric

